

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOUREY NEWELL, individually and on behalf
of a class of all persons and entities similarly
situated,

Plaintiff

vs.

LENDVIA LLC

Defendant.

Case No. 25-1018

UNOPPOSED MOTION FOR EXTENSION OF TIME

The Plaintiff, Jourey Newell, with the consent of Defendant LendVia, LLC respectfully requests that he receive an extension of time to May 28, 2025 in order to oppose Defendant's Motions to Dismiss, Strike, Compel Arbitration, Stay Discovery, and Bifurcate Discovery (ECF Nos. 8, 10, 11, 12, and 13). This additional time is required to address all of the arguments made in five motions filed on the *same day* as well as due to the press of existing prior business and obligations.

RESPECTFULLY SUBMITTED AND DATED this April 28, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this April 28, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.